

REMARKS

This is in response to the Office Action dated April 4, 2005. Claims 1-19 are pending.

Applicant notes with appreciation the Examiner's indication that claims 17-18 contain allowable subject matter.

Claim 1 stands rejected under Section 103(a) as being allegedly unpatentable over Song in view of Kim. This Section 103(a) rejection is respectfully traversed for at least the following reasons.

Claim 1 requires that "the first electrode includes, in each of the plurality of picture element regions, a plurality of unit solid portions arranged in a first direction, whereby the liquid crystal layer takes a substantially vertical alignment in the absence of an applied voltage between the first electrode and the second electrode, and forms a plurality of liquid crystal domains in the plurality of unit solid portions of the first electrode by inclined electric fields produced around the plurality of unit solid portions in response to a voltage applied between the first electrode and the second electrode, each of the plurality of liquid crystal domains taking a radially-inclined orientation." For example and without limitation, see the radially-inclined orientation illustrates in Figs. 5C, 23A and 25A of the instant application.

Song fails to disclose or suggest the radially-inclined orientation called for in claim 1. When viewed from above, Song shows that LC molecules may be oriented in two or four different directions (e.g., see Fig. 3 of Song), but does not illustrate "radially" inclined orientation as called for in claim 1. Citation to Kim cannot cure the aforesaid fundamental flaws of Song.

Additionally, Kim fails to disclose or suggest using the claimed drive scheme in a substantially vertical alignment type LCD. The applicant has uncovered surprising and

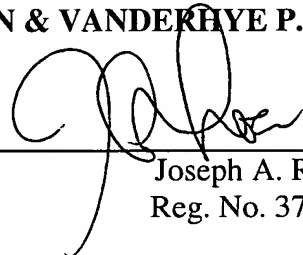
unexpected results associated with using the claimed polarity inversion drive scheme in a substantially vertical alignment type LCD (e.g., see pgs. 69-70 of the instant specification). The cited art fails to disclose or suggest this. Moreover, the unexpected results in this respect rebut any alleged prima facie case of obviousness, and indicate that the instant claims patentably define over the cited art.

It is respectfully requested that all rejections be withdrawn. All claims are in condition for allowance. If any minor matter remains to be resolved, the Examiner is invited to telephone the undersigned with regard to the same.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: _____



Joseph A. Rhoa
Reg. No. 37,515

JAR:caj
901 North Glebe Road, 11th Floor
Arlington, VA 22203-1808
Telephone: (703) 816-4000
Facsimile: (703) 816-4100